

# CERTIFIED MAIL – RETURN RECEIPT REQUESTED

January 14, 2011

Mr. Steven F. Vozzo NCDENR Division of Air Quality 225 Green Street Suite 714 Fayetteville, NC 28301-5043

SUBJECT:

Miscellaneous Organic Chemical Manufacturing NESHAP (MON)

Compliance Report - July 1, 2010 through December 31, 2010

Title V Permit Number 03537T36

Facility ID: 0900009

Dear Mr. Vozzo:

Attached is the DuPont Company – Fayetteville Works' Compliance Report for the Miscellaneous Organic Chemical Manufacturing NESHAP (40 CFR Part 63 Subpart FFFF) for the reporting period from July 1, 2010 through December 31, 2010.

Enclosed is the required photocopy of this report.

If you should have any questions, please call me at 910-678-1155.

Sincerely

Michael E. Johnson Environmental Manager

Attachment / Enclosure

cc: U.S. EPA Region 4, Air and EPCRA Enforcement Section, Atlanta, GA

# Miscellaneous Organic Chemical Manufacturing NESHAP (MON)

### Part 63 Subpart FFFF Compliance Report 40 CFR 63.2520(e)

# DuPont Company – Fayetteville Works North Carolina Title V Air Permit No. 03537T36 Reporting Period from July 1, 2010 through December 31, 2010

40 CFR 63.2520(e)(1) Company name and address:

DuPont Company – Fayetteville Works 22828 NC Highway 87 W Fayetteville, NC 28306-7332

40 CFR 63.2520(e)(2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.

See Attachment 1 for this certification statement.

40 CFR 63.2520(e)(3) Date of report and beginning and ending dates of the reporting period.

The date of this report is January 14, 2011. The reporting period of this report is from July 1, 2010 through December 31, 2010.

40 CFR 63.2520(e)(4) For each SSM during which excess emissions occur, the compliance report must include records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.

There are no sources subject to the Subpart FFFF NESHAP for which a startup, shutdown, and malfunction plan (SSMP) is required.

40 CFR 63.2520(e)(5) The compliance report must contain the information on deviations, as defined in  $\S63.2550$ , according to paragraphs (e)(5)(i), (ii), (iii), and (iv) of this section.

There were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

40 CFR 63.2520(e)(5)(i) If there are no deviations from any emission limit, operating limit or work practice standard specified in this subpart, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

There were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

# DuPont Company – Fayetteville Works North Carolina Title V Air Permit No. 03537T36 Reporting Period from July 1, 2010 through December 31, 2010

40 CFR 63.2520(e)(5)(ii) For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where you are not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in this subpart, you must include the information in paragraphs (e)(5)(ii)(A) through (C) of this section. This includes periods of SSM.

There were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.

40 CFR 63.2520(e)(5)(iii) For each deviation from an emission limit or operating limit occurring at an affected source where you are using a CMS to comply with an emission limit in this subpart, you must include the information in paragraphs (e)(5)(iii)(A) through (L) of this section. This includes periods of SSM.

There were no deviations during the reporting period. In addition, no affected sources at this facility use a continuous monitoring system to comply with an emission limit in this subpart.

40 CFR 63.2520(e)(5)(iv) If you documented in your notification of compliance status report that an MCPU has Group 2 batch process vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by §63.2525(e) that exceeds an applicable HAP usage or emissions threshold.

This section is not applicable.

40 CFR 63.2520(e)(6) If you use a CEMS, and there were no periods during which it was out-of-control as specified in  $\S63.8(c)(7)$ , include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.

This section is not applicable. No affected sources at this facility use a continuous emission monitoring system.

# DuPont Company – Fayetteville Works North Carolina Title V Air Permit No. 03537T36 Reporting Period from July 1, 2010 through December 31, 2010

40 CFR 63.2520(e)(7) Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, you must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario.

This section is not applicable. This site does not have any new operating scenarios that have been operating since the submittal of the notification of compliance status report.

40 CFR 63.2520(e)(8) Records of process units added to a PUG as specified in  $\S 63.2525(i)(4)$  and records of primary product redeterminations as specified in  $\S 63.2525(i)(5)$ .

This section is not applicable. This site does not have any process unit groups.

40 CFR 63.2520(e)(9) Applicable records and information for periodic reports as specified in referenced subparts F, G, H, SS, UU, WW, and GGG of this part and subpart F of 40 CFR part 65.

The periodic report for Subpart UU as specified in 40 CFR 63.1039(b) is provided as Attachment 2.

40 CFR 63.2520(e)(10) Notification of process change.

This section is not applicable. Since the submittal of the notification of compliance status report, this site has not made any process changes that are not within the scope of an existing operating scenario.

DuPont Company – Fayetteville Works
North Carolina Title V Air Permit No. 03537T36
Reporting Period from July 1, 2010 through December 31, 2010

#### **ATTACHMENT 1**

#### Certification of Report Accuracy

As required by 40 CFR 63.2520(e)(2), this document is the statement by a responsible official certifying the accuracy of the content of the subject MON compliance report.

By my signature below, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is accurate. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Ellis H. McGaughy

Plant Manager

January 14, 2011

Date

## Miscellaneous Organic Chemical Manufacturing NESHAP (MON) Part 63 Subpart FFFF

# **Compliance Report**

40 CFR 63.2520(e)

# **DuPont Company - Fayetteville Works** North Carolina Title V Air Permit No. 03537T36 Reporting Period from July 1, 2010 through December 31, 2010

#### **ATTACHMENT 2**

Periodic Monitoring Summary

Report: R807

Report Date:

12/15/2010

8:02:55AM

Report from: 2010-7-1 00 To 2010-12-31

HFPO		Looking	Thomastad	Percent	Late	Non
		Leaking	Inspected	<u>Leaking</u>	Repairs	Repairable
VALVES	JULY	0	0	0.00	0	0
	AUGUST	0	167	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	1	171	0.58	0	0
	DECEMBER	0	1	0.00	0	0
PUMPS	JULY	0	3	0.00	0	0
	AUGUST	0	3	0.00	0	0
	SEPTEMBER	0	3	0.00	0	0
	OCTOBER	0	3	0.00	0	0
	NOVEMBER	0	3	0.00	0	0
	DECEMBER	0	3	0.00	0	0
COMPRESSORS	JULY	0	0	0.00	0	o
	AUGUST	0	0	0.00	0	o
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
AGITATORS	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
CONNECTORS	JULY	0	0	0.00	0	0
	AUGUST	1	1	100.00	0	0
	SEPTEMBER	0	1	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	. 3	0.00	0	0
	DECEMBER	0	0	0.00	0	0

## Miscellaneous Organic Chemical Manufacturing NESHAP (MON) Part 63 Subpart FFFF

### **Compliance Report** 40 CFR 63.2520(e)

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#### **ATTACHMENT 2**

Periodic Monitoring Summary

Report: R807

Report Date:

12/15/2010

8:02:56AM

Report from: 2010-7-1 00 To 2010-12-31

POLYMERS				Percent	Late	Non
		Leaking	Inspected	Leaking	Repairs	Repairable
VALVES	JULY	0	0	0.00	0	0
	AUGUST	0	65	0.00	0	0
	SEPTEMBER	0	0	0.00	0	o
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	65	0.00	0	0
	DECEMBER	0	0	0.00	0	0
PUMPS	JULY	0	2	0.00	0	0
	AUGUST	0	2	0.00	0	0
	SEPTEMBER	1	2	50.00	0	o
	OCTOBER	0	2	0.00	0	0
	NOVEMBER	0	2	0.00	0	0
	DECEMBER	0	2	0.00	0	0
COMPRESSORS	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	o
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	o
AGITATORS	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
CONNECTORS	JULY	0	0	0.00	o	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	o
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0

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VE NORTH		Leaking	Inspected	Percent Leaking	Late Repairs	<u>Non</u> Repairable
VALVES	JULY	0	1	0.00	0	0
,122,20	AUGUST	0	183	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	183	0.00	0	0
	DECEMBER	0	0	0.00	0	0
PUMPS	JULY	0	5	0.00	0	0
	AUGUST	0	5	0.00	0	o
	SEPTEMBER	0	5	0.00	0	0
	OCTOBER	0	5	0.00	0	0
	NOVEMBER	0	5	0.00	0	o
	DECEMBER	0	5	0.00	0	0
COMPRESSORS	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	o
	NOVEMBER	0	0	0.00	0	o
	DECEMBER	0	0	0.00	0	0
AGITATORS	JULY	0	1	0.00	0	0
	AUGUST	0	1	0.00	0	o
	SEPTEMBER	0	1	0.00	0	0
	OCTOBER	0	1	0.00	0	0
	NOVEMBER	0	1	0.00	0	o
	DECEMBER	0	1	0.00	0	0
CONNECTORS	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	o
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	o
	DECEMBER	0	0	0.00	0	0

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Report Date:

12/15/2010

8:02:56AM

Report from: 2010-7-1 00 To 2010-12-31

VE SOUTH						
		Leaking	Inspected	Percent Leaking	Late Repairs	Non Repairable
VALVES	JULY	0	0	0.00	0	0
	AUGUST	0	181	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	o	182	0.00	0	0
	DECEMBER	0	0	0.00	0	0
PUMPS	JULY	0	5	0.00	0	0
	AUGUST	0	5	0.00	0	0
	SEPTEMBER	0	4	0.00	0	0
	OCTOBER	0	4	0.00	0	0
	NOVEMBER	0	4	0.00	0	0
	DECEMBER	0.	5	0.00	0	0
COMPRESSORS	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
AGITATORS	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	2	0.00	0	0
	DECEMBER	0	0	0.00	0	0